

In the Matter of :  
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Numbering Resource Optimization. : CC Docket No. 99-200

On October 17, 2001, the Federal Communications Commission (FCC) released a Public Notice, requesting comments on its proposed national thousand-block number pooling rollout schedule. The initial schedule focused on pooling in Number Plan Areas (NPAs) in the top 100 Metropolitan Statistical Areas (MSAs), with emphasis on jeopardy NPAs that are within the largest 100 MSAs. On November 6, 2001, the Public Utilities Commission of Ohio (Ohio Commission) filed comments with the FCC regarding this rollout schedule. In light of recent information relating to number utilization in Ohio's NPAs, the Ohio Commission now requests that the FCC make a change/substitution to the current pooling rollout schedule in order to promote the most efficient use of numbers in Ohio. The recommendation made by the Ohio Com-

mission is only a substitution and will not affect the total number of NPAs that will implement thousands-block pooling in a single quarter.

## EXECUTIVE SUMMARY

At the time that the Ohio Commission filed its November 6, 2001 comments regarding the FCC's proposed thousands-block number pooling rollout schedule, the 937 (Dayton/Springfield) NPA<sup>1</sup> appeared to be approaching exhaust at a rate that would not allow for the benefits of pooling to be recognized.<sup>2</sup> However, while the 937 NPA continues to be the next area code in Ohio subject to relief planning, the assignment of codes in this NPA has recently decelerated. Furthermore, at a technology and service-specific overlay workshop held by the Ohio Commission on March 26, 2002, telecommunication providers voiced widespread support for advancing 937 in the number pooling rollout schedule from its current 5<sup>th</sup> quarter position. Therefore, the Ohio Commission is requesting a modification to the proposed schedule to simply substitute the 937 NPA for the next Ohio NPA in the rollout schedule. Assuming that the FCC has accepted Ohio's earlier recommendation, the next Ohio NPA to be pooled would be the 216 (Cleveland) NPA during the 3<sup>rd</sup> quarter of the FCC's rollout plan. As discussed in greater detail below, there appears to be a significant difference in the lives of the two NPAs, therefore, the Ohio Commission believes that by pooling 937 in the 3<sup>rd</sup> quarter and 216 in the 5<sup>th</sup> quarter, the benefits of this important number conservation measure will be optimized.

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<sup>1</sup> The 937 NPA contains one of the top 100 MSAs within the United States.

<sup>2</sup> The Ohio Commission noted that the 937 area code had 213 remaining available codes with an average assignment of 8.7 codes per month. Thus, only 24 months remained, at that time, until relief was needed.

## **CURRENT STATUS OF 937 AND 216**

According to the statistics found on NANPA's website, 51 NXX codes were assigned during the first six months of 2001 for the 937 NPA. During the last six months of the year, 28 NXX codes were assigned for a total of 79 NXX codes assigned during 2001. During the first two months of 2002, no 937 NXX codes were assigned in January and 6 NXX codes were assigned in February. Unexpectedly, the 937 area code also experienced the return of 25 NXX codes in 2001. The current data reflects 214 NXX codes available for assignment in 937. Thus, at an average rate of assignment of 4.5 codes per month, the 937 NPA should have a remaining life of approximately 47 months or almost 4 years.

The 216 NPA, according to NANPA statistics, is far from exhaust. In 2001, 26 NXX codes were assigned and 17 were returned. In the first two months of 2002, two NXX codes were assigned and two were returned. The current data also reflects 281 NXX codes available for assignment in 216. Thus, at an average rate of assignment of 1 code per month, the 216 NPA should have a remaining life of approximately 23 years.

While these statistics reflect a large number of returned codes that may turn out to be an anomaly and are based on historical rather than forecasted utilization, it does reflect the large difference in the lives of the two area codes. The Ohio Commission believes that this difference warrants the substitutions of the two NPAs in the current schedule.

## **INDUSTRY SUPPORT FOR MOVING 937 TO THE 3<sup>RD</sup> QUARTER**

As stated previously, on March 26, 2002, the Ohio Commission staff held an industry workshop to discuss the feasibility of technology and service specific overlays in the state of Ohio. The staff and industry agreed that the 937 area code appeared to be the next area code in Ohio in which relief planning will be needed. Widespread support for earlier pooling in 937 was voiced during the workshop by various segments of the industry including the ILEC, CMRS, and CLEC representatives. Furthermore, in the comments of SBC/Ameritech, filed on November 6, 2001 in this docket,<sup>3</sup> SBC/Ameritech recommended that the 937 NPA be pooled during the 2<sup>nd</sup> quarter of the pooling rollout schedule. While Ohio does not have an NPA in the FCC's current 2<sup>nd</sup> quarter roll-out schedule and recognizes that SBC/Ameritech proposed other changes to the schedule, SBC/Ameritech's comments reflect support for 937 as one of the first area codes in Ohio to benefit by thousands block number pooling.

## **CONCLUSION**

The Ohio Commission recommends moving 937 to the 3<sup>rd</sup> quarter position and, therefore, moving 216 to the 5<sup>th</sup> quarter position. As the 937 NPA is the next area code in Ohio scheduled for relief planning, the Ohio Commission would like to realize the benefits of this important conservation measure prior to the commencement of area code relief in 937. While the Ohio Commission fully understands that thousands-block number pooling is not a substitute for timely area code relief planning, the Ohio Com-

mission also believes that such a measure may significantly delay relief and its associated costs for Ohio consumers and telephone industry. The Ohio Commission urges the FCC to adopt this new proposal.

Respectfully Submitted,

**On Behalf of the Public Utilities  
Commission of Ohio**

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Date Submitted: April 4, 2002

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<sup>3</sup> See Comments of SBC Communications, Inc., CC Docket 99-200, Attachment A., page 1, filed November 6, 2001.